## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

ANGEL DAVID MORALES VALLELLANES, Plaintiff,

v.

JOHN POTTER, UNITED STATES POSTMASTER GENERAL, ET. ALS., Defendants.

**CIVIL NO. 97-2459 (JAG)** 

DAMAGES BASED ON
RETALIATION AND
DISCRIMINATION; PROHIBITED
PERSONNEL PRACTICES;
UNFAIR LABOR PRACTICES;
BREACH OF COLLECTIVE
BARGAINING AGREEMENT

TRIAL BY JURY IS HEREBY REQUESTED

## MOTION TO REQUEST ADDITIONAL TIME TO FILE TRANSCRIPTS

**COMES NOW**, plaintiff Angel David Morales-Vallellanes through his legal counsel and very respectfully inform this Honorable Court:

- This Honorable Court ordered plaintiff until March 8,2005 to hand over the transcripts of the depositions taken.
- 2. The transcripts are not finished yet and Planifitt respectfully request until March 18,2005 to hand over the transcripts to the U.S. District Attorney Fidel Sevillano.
- 3. The undersigned has already asked brother attorney Fidel Sevillano for the additional time and he has no problem to extend the term until March 18,2005.

**WHEREFORE**, it is respectfully requested from this Honorable Court to authorize the extension of time to file the transcripts until March 18, 2005.

## RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico on this 7 March 2005.

MIGUEL E. MIRANDA-GUTIERREZ, ESQ. ATTORNEY FOR PLAINTIFF PMB 132, 255 Ave. Ponce de Leon, Suite 75 San Juan, Puerto Rico 00918-3349

TEL: 282-0022 FAX: 751-0883